

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: §
FREE SPEECH SYSTEMS LLC, § **Chapter 11**
Debtor. § **Case No. 22-60043**
§
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§

**STIPULATION AND AGREED ORDER EXTENDING DEADLINE FOR TRUSTEE TO
RESPOND TO THE MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.**

FINAL FEE APPLICATION
(Relates to Doc. No. 966)

WHEREAS, on July 29, 2022 (“*Petition Date*”), Free Speech Systems LLC (“*Debtor*”) filed its voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (“*Court*”).

WHEREAS, on September 14, 2022, an application was filed to employ Martin, Disiere, Jefferson & Wisdom, L.L.P. (“*MDJW*”) as special counsel to the Debtor [DE 155], and on December 21, 2022, the Court approved the retention of MDJW as special counsel for the Debtor [DE 348].

WHEREAS, on June 21, 2024, the Court entered an *Order Dismissing Case* [DE 956] (“*Dismissal Order*”) which, among other matters, (i) dismissed the Debtor’s bankruptcy case, (ii) directed all final applications for compensation be filed within 14 days after the entry of the Dismissal Order, and (iii) directed the CRO of the Debtor to transfer control of the Debtor’s accounts to Christopher R. Murray, in his capacity as the Chapter 7 Trustee (“*Trustee*”) for the bankruptcy estate of Alexander Jones (Case No. 22-33553).

WHEREAS, MDJW filed its *Final Fee Application* [DE 966] on July 5, 2024 (the “*Final Fee Application*”) requesting allowance and payment on a final basis of professional fees and

reimbursable expenses for professional services rendered as special counsel to the Debtor for the period of August 30, 2022 through June 21, 2024.

WHEREAS, the deadline for all parties to file a response to the Final Fee Application is July 26, 2024 (“*Original Response Deadline*”).

WHEREAS, the Trustee requested, and MDJW has agreed to, a 30-day extension of the Original Response Deadline of the Trustee in order to aid in a more efficient transition of the Alex Jones bankruptcy case after the Court converted it from chapter 11 to chapter 7 on June 14, 2024.

NOW, THEREFORE, IT IS STIPULATED AND AGREED BY THE PARTIES HERETO AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED THAT:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
2. The deadline for the Trustee to file a response and/or objection to the Final Fee Application is extended to **August 23, 2024**.
3. Nothing herein shall be construed to prohibit the Parties from seeking further extensions by agreement and/or by further order of the Court.
4. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court’s approval.
5. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

IT IS SO ORDERED.

Dated: _____, 2024.

**HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE**

Agreed as to form and substance:

Porter Hedges LLP By: <u>/s/ Joshua W. Wolfshohl</u> Joshua W. Wolfshohl State Bar No. 24038592 1000 Main Street, 36 th Floor Houston, Texas 77002 (713) 226-6000 (713) 228-1331 (fax) jwolfshohl@porterhedges.com Proposed Counsel to Christopher R. Murray, Chapter 7 Trustee of the Alex Jones Estate	Martin, Disiere, Jefferson & Wisdom, L.L.P. By: <u>/s/ Christopher W. Martin</u> Christopher W. Martin State Bar No. 13057620 808 Travis, Suite 1100 Houston, Texas 77002 (713) 632-1700 (713) 2222-0101 (fax) martin@mdjwlaw.com Special Counsel for the Debtor
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was duly served by electronic transmission to all registered ECF users appearing in the case on July 26, 2024.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl